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October 7, 2022

Regional Freedom of Information Officer  
U.S. EPA, Region 5  
77 West Jackson Boulevard (MI-10J)  
Chicago, IL 60604-3590  
(312) 886-6803

Re: FOIA Request for documents related to the sampling performed by EPA in the City of East St. Louis, Illinois in 2009, 2011, and 2015

Dear Regional Freedom of Information Officer:

Pursuant to the Freedom of Information Request Act, 5 USC § 552, please forward to my attention, the following documents:

1. **The final, signed and sent version of the 2012 letter sent from Ken Bardo, EPA Project Manager, to the Honorable Alvin Park.<sup>1</sup>**
2. **Any and all environmental media sampling, testing, and analysis performed by or on behalf of the EPA in the City of East St. Louis, as referenced in the 2012 letter and September 9, 2016 letter sent from Jose Cisneros, Chief, Remediation and Re-use Branch, to the Honorable Emeka Jackson-Hicks.<sup>2</sup>**

The 2012 draft letter (Ex. A) states the EPA sampled soil at four residences along Wilford Avenue in East St. Louis, Illinois on August 14 and 15, 2012. Five surface soil samples collected down to a depth of six inches were combined from the grass area in the backyards. The composite soil sample was analyzed for polychlorinated biphenyls. The 2016 letter (Ex. B) indicates this 2012 sampling was a continuation of sampling begun in 2009.

The 2016 letter states that EPA sampled additional properties in the City of East St. Louis on April 29-30, 2015; that included the collection of 20 soil samples from mainly underdeveloped properties located between the facility boundary and residential locations sampled in 2012. EPA collected the samples from the top six inches of the ground and analyzed them for polychlorinated biphenyls. The 2016 letter stated EPA was evaluating the samples from 2009, 2012, and 2015.

3. **Any and all documents and communications related to the 2009, 2012, and 2015 sampling referenced in the above-referenced letters including communications by the EPA to third-parties, including, but not limited to the City of East St. Louis.**

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<sup>1</sup> A draft version of the 2012 letter is attached as Exhibit A.

<sup>2</sup> The 2016 letter is attached as Exhibit B.

4. **Any and all documents and communications that describe the background, purpose, and intent of the sampling referred to in the above-referenced letters.**
5. **Any and all documents and communications from the City of East St. Louis, Illinois in response to the above-referenced letters.**

To the extent this information is available electronically, I prefer to receive it in that format. If costs associated with this request will exceed \$2,500.00, please notify me with an estimate; I will promptly respond regarding incurring the additional costs.

Thank you in advance. If you have any questions or concerns, please contact me via e-mail or via telephone at the information provided above.

Sincerely,

Morgan Smith

# EXHIBIT A

Honorable Alvin Parks  
301 River Park Drive  
East St. Louis, IL 62201

Dear Mayor Parks:

The United States Environmental Protection Agency (EPA) sampled soil at four residences along Wilford Avenue in East St. Louis on August 14 and 15. Five surface soil samples collected down to a depth of six inches were combined from the grass area in the backyards. The composite soil sample was analyzed for polychlorinated biphenyls (PCBs). The sampling was conducted based on information obtained by EPA that suggests that the far southern and western areas of East St. Louis could be impacted from historical industrial operations to the south.

The level of PCBs found in backyard soil at the four homes typically exceeded the EPA health screening level of 1 part per million (ppm) for residential soils recommended by EPA. The level of PCBs ranged from 643 to 7,063 parts per billion. For your information, enclosed is a fact sheet from the Illinois Department of Public Health on how people can reduce exposure to contaminants in soil. Also enclosed is an EPA fact sheet that describes the sampling event. EPA will be evaluating all the sampling results in the East St. Louis area and will keep you informed of our progress.

The City of East St. Louis and CDC Development Corporation own various lots just south of Wilford Avenue, located between D Street and South 19<sup>th</sup> Street. These lots are mostly undeveloped and located in the TIF 3C Redevelopment Project Area. EPA recommends that investigation be performed in this area to assess the PCB levels in soils at these lots and how the levels may need to be addressed during future development. EPA would be glad to meet and discuss the options for these investigations and share the information we have.

I can be reached at 312-886-7566. I am also available by e-mail at [bardo.kenneth@epa.gov](mailto:bardo.kenneth@epa.gov).

Sincerely yours,

Ken Bardo  
EPA Project Manager  
Corrective Action Section

Enclosures (2)

cc: David Webb, IDPH  
Doug King, Eastside Health District

# EXHIBIT B



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

SEP 09 2016

REPLY TO THE ATTENTION OF:

LU-9J

Honorable Emeka Jackson-Hicks  
301 River Park Drive  
East St. Louis, IL 62201

Dear Mayor Jackson-Hicks:

In 2012, the United States Environmental Protection Agency (EPA) wrote to (then) Mayor Parks to report the results of backyard soil contamination sampling at residences along Wilford Avenue in East St. Louis. In the letter, EPA recommended that sampling continue in the area just south of Wilford Avenue, which is zoned for residential use. The 2012 sampling was a continuation of sampling begun in the in 2009 to investigate whether local historical manufacturing had contaminated residential areas. In 2015, EPA sampled additional properties in this area to determine whether local historical industrial operations could have spread contamination.

The sampled soil was in an area zoned for residential use near the City's western boundary adjacent to the Solutia, Inc., W.G. Krummrich facility, in Sauget, IL. Sampling occurred from April 29-30, 2015, and included the collection of 20 (composite) soil samples from mainly undeveloped properties located between the facility boundary and residential locations sampled in 2012. Please refer to the enclosed figure. The properties, which are primarily owned by the City of East St. Louis and the CDC Development Corporation, are located in the TIF 3C Redevelopment Project Area.

EPA collected the samples from the top six inches of the ground from City-owned parcels and in grassy areas in City rights-of-way, and analyzed them for polychlorinated biphenyls (PCBs) in a laboratory. A number of the sample results exceeded the EPA health screening-level for residential soils of one part per million (ppm) for total PCBs. The levels of PCBs ranged from 0.2 to 17 parts per million PCB.

EPA is evaluating the samples from 2009, 2012, and 2015 to determine whether the sampled area qualifies for removal actions or whether more information is needed to make that determination. EPA recommends that additional investigation be performed in this area to assess how contamination levels should be considered during future development. For your information, enclosed is a fact sheet from the Illinois Department of Public Health on how people can reduce exposure to contaminants in soil.

Should you have any questions about the sampling procedures or results, please contact Ms. Carolyn Bury of my staff at 312-886-3020 or by e-mail at bury.carolyn@epa.gov.

I can be reached at 312-886-6945. I am also available by e-mail at Cisneros.jose@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jose Cisneros". The signature is fluid and cursive, with the first name "Jose" being more prominent than the last name "Cisneros".

Jose Cisneros  
Chief  
Remediation and Re-use Branch

Enclosures

cc: Lynn Williams, IDPH  
Myla Oliver-Blanchard, Eastside Health District  
Carolyn Bury, EPA Region 5